

### **REMARKS/ARGUMENTS**

This is a full and timely response to the Office Action dated April 30, 2009. Applicants note with appreciation the Examiner's thorough examination of the application as evidenced by the Office Action. Prior to the issuance of the present office action, Claims 1-50 and 80-108 were pending. In the present response, Claims 48 and 82 have been canceled. It is respectfully submitted that pending Claims 1-47, 49, 50, 80, 81, and 83-108 are patentable. As such, Applicants respectfully request reconsideration and allowance of the present claims in light of the following remarks.

#### **Claim Objections**

The Examiner has objected to Claim 88 as being a substantial duplicate of Claim 82 under 37 CFR 1.75. The Applicants note that Claim 82 has been canceled and respectfully request that the Examiner withdraw this objection.

#### **35 USC § 102**

##### *Independent Claim 1*

At page 2 of the present Office Action, the Office Action has rejected independent Claim 1 as being anticipated by U.S. Patent No. 6,279,670 to Eddison, et al ("Eddison"). Applicants respectfully assert that Eddison fails to disclose or suggest each of the limitations recited in Claim 1. For example, Eddison fails to disclose a method for running a bore-lining tubing string into a bore comprising "running a *tubing string* into a bore while agitating the string to reduce the friction between the string and the bore wall" as recited in Claim 1. The Office Action argues that Eddison discloses at Figure 1 a method for running a bore-lining tubing string into a bore. However, it is respectfully asserted that Eddison discloses a "*drill string*" used for drilling a bore. In contrast, a "*tubing string*" is generally placed into a completed bore section to create a metallic tubing lining (specification page 1, lines 10-23 and page 2, lines 1-5) and is not used for *drilling* a bore. Moreover, Eddison does not disclose agitating the string "to reduce friction between the string and the bore wall and facilitate the translation of the string into the bore." In contrast, Eddison discloses providing "a percussive or hammer action to assist in drilling in hard

rock” (col. 5, line 29), the percussive or hammer action being applied to a drill bit in contact with a cutting face (col. 5, line 6; col. 3, line 25). Accordingly, the Applicants respectfully request the Examiner withdraw this rejection.

*Independent Claim 50*

The Office Action has also rejected independent Claim 50 as being anticipated by U.S. Patent No. 6,279,670 to Eddison, et al (“Eddison”). Applicants respectfully assert that Eddison fails to disclose or suggest each of the limitations recited in Claim 50. For example, for the reasons discussed above in relation to independent Claim 1, Eddison fails to disclose “an apparatus for use in agitating a bore lining *tubing* string in a bore.” Accordingly, the Applicants respectfully request the Examiner withdraw this rejection.

*Independent Claims 48 & 49*

Independent Claims 48 and 49 were rejected as being anticipated by U.S. Patent No. 5,439,290 to Wicks, III et al (“Wicks”). The Applicants note that Claim 48 has been canceled and respectfully request that the Examiner withdraw this rejection.

In addition, Applicants assert that Wicks fails to disclose or suggest each of the limitations recited in Claim 49. For example, Wicks fails to disclose a method of cementing a bore-lining tubing string in a bore comprising “pumping cement into an annulus surrounding the string while applying *pressure pulses* to the cement.” The Office Action argues that Wicks discloses at column 6, line 10 pumping cement into an annulus surrounding the string while applying pressure pulses to the cement. However, Wicks discloses *vibrating* the casing and fluid within the wellbore (col. 6, line 65-68). Applicants note the vibration effect disclosed in Wicks is described as being effective for preventing gravel pack “settling” and “bypassing formation solids through the gravel pack” (col. 3, line 40). In contrast, the pressure pulses recited in Claim 49 assist “in *displacing* drilling fluid and other deposits from the annulus” (specification page 14, line 21). Accordingly, the Applicants respectfully request the Examiner withdraw this rejection

**Rejections of Dependent Claims under 35 USC § 102 and 35 USC § 103**

The patentability of the independent claims have been argued as set forth above and thus the Applicants will not take this opportunity to argue the merits of the rejections with regard to the dependent claims. However, the Applicants do not concede that the dependent claims are not independently patentable and reserve the right to argue the patentability of the dependent claims at a later date if necessary.

**Conclusion**

The foregoing is submitted as a full and complete response to the Office Action mailed April 30, 2009. The foregoing amendments to the claims, when taken in conjunction with the appended remarks, are believed to have placed the present application in condition for allowance, and such action is respectfully requested.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefor (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

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ELECTRONICALLY FILED USING THE EFS-WEB ELECTRONIC FILING SYSTEM OF THE UNITED STATES PATENT & TRADEMARK OFFICE ON July 30, 2009